

**No. PD-0020-21**

In the Court of Criminal Appeals of Texas  
At Austin

FILED  
COURT OF CRIMINAL APPEALS  
4/22/2021  
DEANA WILLIAMSON, CLERK

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**No. 01-19-01008-CR**

In the First Court of Appeals at Houston

**No. 2012280**

In the County Criminal Court at Law No. 12  
Of Harris County

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**State of Texas**

*Appellant*

v.

**Lakesia Keyon Brent**

*Appellee*

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**State's First Motion for Extension  
Of Time to File Appellate Brief**

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To the Honorable Court of Appeals:

The State of Texas asks for a 4-day extension of time in which to file its brief on discretionary review. The following facts are relevant:

1. On Feb. 27, 2015, Appellee was charged by criminal information with the misdemeanor offense of theft, which occurred on or about Feb. 17, 2015. (C.R. 06). On March 13, 2016, a petit jury found Appellee guilty

of the offense. (C.R. 46). On March 04, 2016, the trial court sentenced Appellee to 180 days in the Harris County Jail, but suspended that sentence for a period of one year and placed Appellee under community supervision. (C.R. 48). One year later, on March 22, 2017, after the supervision period expired, the trial court discharged Appellee. (C.R. 53). Over two-and-a-half years after discharge, the Appellee moved for the trial court to grant judicial clemency; on Nov. 19, 2019, the trial court granted Appellee's motion, set aside the jury's verdict, released Appellee from any further penalties and disabilities related to the conviction, and dismissed the charging instrument. (C.R. 67). On Dec. 03, 2019, the State gave notice of its intent to appeal. (C.R. 73-74). On Dec. 10, 2020, the Court of Appeals for the First District released an opinion affirming the trial court's dismissal. *State v. Brent*, 615 S.W.3d 667, 676 (Tex. App.—Houston [1st Dist.] 2020, pet. granted). This court granted discretionary review on March 17, 2021.

2. The State's brief was due on April 16, 2021.
3. This is the State's first request for extension.
4. A copy of the State's briefing is being filed with this motion for extension. The undersigned attorney miscalculated the date that this briefing was due. Specifically, the undersigned attorney projected the

brief to be due on April 17, 2021, which would make the briefing due on April 19, 2021 – the date the undersigned attorney attempted to file the brief. TEX. R. APP. P. 4.1.

WHEREFORE, the State prays that this Court will grant the requested extension.

Respectfully submitted,

/s/ John D. Crump

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/s/ John D. Crump  
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